

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE DOE, an individual,

Plaintiff,

vs.

AMAZON.COM, INC, a Delaware corporation,
and

IMDB.COM, INC., a Delaware corporation,

Defendants.

No. 2:11-CV-01709-MJP

**DECLARATION OF JOHN W.
DOZIER, JR. IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS PURSUANT TO RULE 10(a)
AND CROSS-MOTION TO
PROCEED ANONYMOUSLY**

I, John W. Dozier, Jr., herby declare as follows:

1. I am an attorney at and the owner of Dozier Internet Law, P.C. I am lead counsel for Plaintiff, Jane Doe, in the above referenced matter. I make this declaration based upon my personal knowledge of the facts of this case and communications with Plaintiff Jane Doe regarding same, and if asked, would testify to the truth of the matters herein.

2. This case has garnered extensive public attention. Over 750 articles have been published on the Internet regarding this case. Attached hereto as "Exhibit A" is an example of the U.S. national media attention given to this litigation. Attached hereto as "Exhibit B" is an

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2:11-CV-01709) - 1

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1 example of the international media attention given to this litigation. Attached hereto as “Exhibit
2 C” is an example of the entertainment industry media attention given to this litigation.

3 3. Ms. Doe is already the target of retaliation, harassment and ridicule. Attached
4 hereto as “Exhibit D” is a true and correct copy of harmful statements directed at Plaintiff on the
5 Internet. This exhibit also evinces that Plaintiff has been branded as “that 40 year old actress
6 who sued Amazon and IMDb” and that she is the subject of lewd and harmful behavior as a
7 result of filing this lawsuit. If identified, Ms. Doe fears that these attacks would severely worsen
8 as they would be targeted directly at her.

9 4. Ms. Doe has experienced Defendants’ tyrannical behavior first hand. Since
10 complaining about her date of birth appearing on IMDb.com, Plaintiff’s IMDb.com account has
11 been “flagged,” making it difficult for her to control any information about herself. For example,
12 Defendants refuse to acknowledge and publish certain of Ms. Doe’s acting credits, whereas other
13 actors in the same exact film with the same exact credit have the information available on their
14 respective IMDb profiles. Ms. Doe fears further retaliation from Defendants.

15 5. Since the filing of Plaintiff’s Complaint, our law firm has received calls from
16 numerous entertainment industry professionals complaining of similar experiences. Many of
17 these individuals have described in detail the vengeful attitude and retaliatory nature of
18 Defendants actions toward them with respect to their IMDb.com profiles.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct.

21
22 Dated this 28th day of November, 2011. By: /s/ John W. Dozier, Jr.
23 John W. Dozier, Jr.

CERTIFICATE OF SERVICE

I certify that on November 28, 2011, I electronically filed the foregoing DECLARATION OF JOHN W. DOZIER, JR. IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS PURSUANT TO RULE 10(a) AND CROSS-MOTION TO PROCEED ANONYMOUSLY with the Clerk of the Court using the CM/ECF system, thereby sending notification of such filing to the following attorneys of record.

Ashley A. Locke, Esq.
Breena Michelle Roos, Esq.
Elizabeth L. McDougall-Tural, Esq.
Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, Washington 98101

I certify under penalty of perjury that the foregoing is true and correct.

Dated this 28th Day of November, 2011.

DOZIER INTERNET LAW, P.C.

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